

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

In re:	)	
	)	
<b>JUNE ATTARIAN,</b>	)	Case Number <b>05-60373</b>
	)	
Debtor.	)	Chapter 7
	)	
<b>ROBERT J. BLACKWELL, TRUSTEE,</b>	)	Adversary Number _____
	)	
Plaintiff.	)	
vs	)	
	)	
<b>JUNE ATTARIAN,</b>	)	
	)	
Defendant.	)	

**COMPLAINT FOR TURNOVER OF PROPERTY AND TO REVOKE DISCHARGE**

COMES NOW Robert J. Blackwell, Chapter 7 Trustee, by and through his undersigned counsel, and for his Complaint for Turnover of Property and to Revoke Discharge, states to the Court as follows:

1. June Attarian (hereinafter "Debtor") filed for voluntary Chapter 7 Bankruptcy protection on October 15, 2005.
2. Robert J. Blackwell (hereinafter "Plaintiff/Trustee") is the duly qualified and acting Chapter 7 Trustee in this case.
3. This Court has jurisdiction over this Adversary proceeding pursuant to 28 U.S.C. §1334 and Rule 9.01 of the Local Rules of the United States District Court for the Eastern District of Missouri.
4. Venue is proper pursuant to 28 U.S.C. §1409.

**COUNT I - TURNOVER OF PROPERTY**

5. Trustee restates and realleges the allegations contained in paragraphs 1-4.
6. This Count for Turnover of Property of the Estate constitutes a “core” proceeding pursuant to 28 U.S.C. §157(b)(2)(E).
7. The Plaintiff/Trustee is informed and believes that among the property of the Bankruptcy Estate is Debtor’s 2002 Ford Mustang and Debtor’s real estate transferred in June of 2004.
8. On March 22, 2006, this Court entered an Order granting the Trustee’s Motion to Compel, and ordered the Debtor to turnover the requested information on said assets.
9. The Trustee believes that said items have value to the Debtor’s Bankruptcy Estate and will result in a distribution to creditors.
10. Trustee requests sanctions, attorney’s fees and costs due to the Debtor’s failure to comply with Trustee’s repeated requests to recover said assets and her failure to comply with this Court’s March 22, 2006 Order.

WHEREFORE, the Trustee prays that this Honorable Court make and enter its Order entering Judgment in favor of the Trustee and against the Debtor for the immediate turnover of Debtor’s 2002 Ford Mustang and information as to Debtor’s real estate transferred in June of 2004, together with sanctions, costs, interest, attorney’s fees, and for such other and further Relief as the Court deems just and proper.

**COUNT II - REVOKE DISCHARGE**

11. Trustee restates and realleges the allegations contained in paragraphs 1 - 10.
12. This Count to Revoke Discharge constitutes a “core” proceeding pursuant to 28 U.S.C. §157(b)(2)(J).

13. On March 22, 2006, this Court entered an Order directing the Debtor to turnover the requested information on said assets.
14. The Debtor knowingly and fraudulently failed to deliver the requested information or assets to the Trustee.
15. The Debtor failed to cooperate with the Trustee to deliver the requested information or assets to the Trustee.
16. The Debtor has failed to comply with the march 22, 2006 Order entered by this Court.

WHEREFORE, Trustee prays this Honorable Court make and enter its Order revoking Debtor's Discharge under either 11 U.S.C. §727(d)(2) or §727(d)(3), and for such other and further Relief as the Court deems just and proper.

Respectfully submitted,  
**BLACKWELL & ASSOCIATES, P.C.**

/s/ **Samantha L. Smith**

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